

STATEMENT OF BASIS

Tenneco Powertrain
Limestone County
Athens, Alabama
Facility Number 708-0020

Tenneco Powertrain has applied for a Major Source Operating Permit (MSOP). This proposed Title V Major Source Operating Permit will be issued under the provisions of ADEM Admin. Code R. 335-3-16. The above named applicant has requested authorization to continue the work and operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

Background

This facility produces engine head gaskets and seals. The Standard Industrial Classification for this work is 3714. The only significant pollutants from this facility are Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP).

In April 1992, Air permits were issued to McCord Payen to construct an automotive gasket production facility in Athens. The name of this facility changed to Federal Mogul in 1998. A Major Source Operating Permit was issued to this facility on January 5, 2000. These permits limited the VOC emissions from each line to a total of 235 tons per year for the entire facility. On January 5, 2005, a Synthetic Minor Operating Permit was issued to Federal Mogul, limiting this facility to 95 tons per year of VOC and 24.5 tons per year of HAP. The last SMOP issued to Federal Mogul with these limits was 708-0020-X024 on June 17, 2011. On August 11, 2015, Air Permits 708-0020-X027 and X028 were issued to Federal Mogul limiting VOC emissions to 245 tons per year, HAP to 24.5 tons per year, and any single HAP to 9.5 tons per year. Both of these Air Permits were reissued on December 2, 2015 to remove some sources from the RTO. On May 21, 2018, Air Permits 708-0020-X027 and X028 were issued to Federal Mogul for new and existing sources at this facility. Air Permit 708-0020-X029 was reissued on December 5, 2018 for an additional wash-prime line. On February 27, 2019, a Temporary Authorization to Operate was issued for new sources on these to Air Permits. On April 15, 2020, the Department received a Major Source Operating Permit application from Tenneco Powertrain for this facility.

Sources controlled by regenerative thermal oxidizer

Until 2015, this facility was able to control VOC and HAP emissions by ducting all significant sources of these pollutants to an Adwest Regenerative Thermal Oxidizer (RTO). When the capacity of the existing RTO was exceeded by the increased number of sources, some sources were vented to the atmosphere. The RTO is used to control HAP sources to keep the facility below synthetic minor HAP limits. The sources controlled by the RTO include:

Auto Screen Printer #2 IR Oven
Auto Screen Printer #2 DB Accumulator
Five Debubble Chambers
Five Batch Ovens
Blue Cure Oven Front

Emissions Standards

VOC

VOC emissions from this facility are limited to 245 tons in any 12-month period. Emissions calculations are based on material usage and emission factors determined from stack test.

HAP

HAP emissions from this facility are limited to 24.5 tons for all HAP and 9.5 tons for any single HAP in any 12-month period.

Periodic Monitoring

Records of the VOC and HAP content of coatings and the quantity used shall be kept for five years. The RTO temperature shall be recorded.

Uncontrolled Sources

Most air sources at this facility vent directly to the atmosphere.

Emissions Standards

VOC

VOC emissions from this facility are limited to 245 tons in any 12-month period. Emissions calculations are based on material usage and emission factors determined from stack test.

HAP

HAP emissions from this facility are limited to 24.5 tons for all HAP and 9.5 tons for any single HAP in any 12-month period.

Expected Emissions

Actual air emissions from this facility were reported to be 94 tons of VOC, 10 tons of HAPs and 6 tons of glycol ether EB acetate in 2019.

Periodic Monitoring

Accurate and understandable records of consumption, which record at least the last five years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents that pertain to this air permit upon request. These records shall contain the following information:

1. The type, quantity in gallons, and weight in pounds of each VOC or HAP containing material used during each calendar month.
2. The percent by weight of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
3. The percent by volume of VOCs, water, solids, HAPs, and exempt VOC compounds content of each VOC containing material used each calendar month.
4. Compliance with VOC and HAP limits shall be based upon monthly material use inventories. Emissions may be adjusted for VOC and HAP

content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance.

5. Complete inventories of the VOC and HAP containing materials (their usage, VOC content and HAP content) shall be made at the end of each calendar month.
6. The amount of VOCs emitted per calendar month from the coating and cleaning operations in units of pounds and tons.
7. The rolling 12-month total of VOCs emitted from the coating and cleaning operations in units of pounds and tons.

Within the first 10 days of each month, compliance with all provisos in this permit will be determined. These records will be maintained for 5 years. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

A report summarizing the reporting requirements shall be submitted each calendar quarter, in a format approved by the Department in advance.

Emergency Generator

Tenneco has one emergency electric generator. This spark ignition propane fueled 102 bhp emergency generator was manufactured and installed in 1995. This unit is subject to 40 CFR 63 subpart ZZZZ.

Emissions Standards

Opacity

These units shall not discharge into the atmosphere opacity greater than twenty percent (20%), as determined by a six (6) minute average. During one six (6) minute period during any sixty (60) minute period, this unit may discharge opacity not exceeding forty (40%) percent.

Particulate Matter

These units shall not discharge into the atmosphere particulate matter in any one hour in excess of $E = 3.59 (P0.62)$ where P is the process weight in tons per hour, and E is the emissions in pounds per hour.

Expected Emissions

Air emissions from the generator are estimated to be 1 pound per hour of NO_x and CO. The emergency generator is expected to operate less than 50 hours each year.

Periodic Monitoring

Tenneco is required to have a non-resettable hour meter on this SI ICE, and keep records of maintenance.

Recommendations

I recommend issuing the attached Title V permit after the required public comment and

EPA review. The proposed monitoring is sufficient to demonstrate compliance with all applicable air regulations.

Hal Brock
Industrial Chemicals Section
Chemical Branch
Air Division

June 23, 2020